

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	19-CR-1631 JB
)	
PRAGNESHKUMAR PATEL,)	
)	
Defendant.)	

**DEFENDANT PRAGNESHKUMAR PATEL'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO OBJECTIONS TO HIS PRESENTENCE INVESTIGATION
REPORT [DOC. 597]**

Defendant Pragneshkumar Patel, by and through his counsel of record, Jason Bowles of Bowles Law Firm and Robert Gorence of Gorence Law Firm, hereby moves this Court for an extension to file his objections to his Presentence Investigation report (Doc. 597) and in support of his motion states as follows:

1. Mr. Patel's PSR (Doc. 597) was disclosed on October 4, 2023.
2. Mr. Patel's objections to his PSR are due on or before October 18, 2023.
3. Counsel for Mr. Patel, Jason Bowles, starts a 2-3 day civil bench trial in Second Judicial District Court beginning on October 16, 2023, and has several mediations and other deadlines in October.
4. Counsel requests thirty (30) day extension to file his objections.
5. Assistant United States Attorney, Letitia Simms does not oppose this request.

WHEREFORE, Mr. Patel respectfully requests this Court enter an order granting him a one week extension to file his objections to his PSR.

Respectfully submitted,

/s/ Jason Bowles

Jason Bowles

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I hereby certify that a true and correct copy
of the foregoing was electronically submitted
this 15th day of October, 2023 to:

Counsel Listed through the CM/ECF Filing System

/s/ Jason Bowles

Jason Bowles

Bowles Law Firm